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September 8, 2003

Thomas M. Dorman, Esq. Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40602 SFP 0 9 2003

Re:

Case No. 2003-00335

Dear Mr. Dorman:

Please find enclosed the original and twelve copies of the Petition to Intervene of Kentucky Industrial Utility Customers, Inc. filed in the above-referenced matter.

By copy of this letter, all parties listed on the attached Certificate of Service been served. Please place this document of file.

Very Truly Yours,

Michael L. Kurtz, Esq.

BOEHM, KURTZ & LOWRY

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MLKkew Attachment

ce:

Certificate of Service Richard Raff, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by mailing a true and correct copy, by regular U.S. mail (unless otherwise noted) to all parties on the 8th day of September, 2003.

Michael S. Beer Vice President, Rates & Regulatory Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

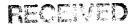
Honorable Elizabeth E. Blackford Assistant Attorney General Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, KY 40601-8204

Mike Laros Managing Director/Co-President Barrington-Wellesley Group, Inc. 2479 Lanam Ridge Road Nashville, IN 47448

Honorable Linda S. Portasik Senior Corporate Attorney Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

Honorable Kendrick R. Riggs Ogden, Newell & Welch, PLLC 1700 Citizens Plaza 500 West Jefferson Street Louisville, KY 40202

Michael L. Kurtz, Esq.



COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

SEP 0 9 2003

PUBLIC CONTACTS

CONTA

In The Matter Of An Investigation Pursuant To KRS 278.260 Of The Earnings Sharing Mechanism Tariff Of Louisville Gas & Electric Company

: Case No. 2003-00335

PETITION TO INTERVENE OF KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), Kentucky Industrial Utility Customers, Inc. ("KIUC") requests that it be granted full intervenor status in the above-captioned proceeding and states in support thereof as follows:

- 1. KIUC is an association of the largest electric and gas public utility customers in Kentucky. The purpose of KIUC is to represent the industrial viewpoint on energy and utility issues before this Commission and before all other appropriate governmental bodies. The members of KIUC who purchase electricity from Louisville Gas & Electric ("LG&E") and who will participate herein are: General Electric Appliance Park, Carbide Industries, LLC, Ford Motor Company, E.I. DuPont de Nemours & Company, Kosmos Cement Company and Rohm & Haas Kentucky, Inc. KIUC will supplement its Petition with the names of additional participating members as this information becomes known.
- 2. The matters being decided by the Commission in this case may have a significant impact on the rates paid by KIUC for electricity. Electricity represents a significant cost of doing business for KIUC. The attorneys for KIUC authorized to represent them in this proceeding and to take service of all documents are:

Michael L. Kurtz, Esq. **BOEHM, KURTZ & LOWRY**36 East Seventh Street, Suite 2110

Cincinnati, Ohio 45202

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E-Mail: mkurtzlaw@aol.com

3. The position of KIUC cannot be adequately represented by any existing party. KIUC intends to play a constructive role in the Commission's decision making process herein and KIUC's participation will not unduly prejudice any party.

WHEREFORE, KIUC requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

Michael L. Kurtz, Esq.

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COUNSEL FOR KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.

September 8, 2003